



WASHINGTON, DC

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May 1, 2019

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

Re: Notice of *Ex Parte* Communication, MB Docket No. 18-119

Dear Ms. Dortch:

On May 1, 2019, the following individuals participated in a telephone conference with Nathan Leamer, Policy Advisor to Chairman Pai, and Al Shuldiner, Chief of the Audio Division, to discuss one aspect of the draft order released in the above-referenced proceeding with respect to the rules for FM translator interference complaints. The participants in the call were: Mike Cooney, CTO, Beasley Media Group, LLC (“Beasley”); Sally Buckman, counsel to Beasley; Jeff Littlejohn, EVP, Engineering & Systems, iHeart Communications, Inc. (“iHeart”); and Marissa Repp, counsel to iHeart.

Beasley and iHeart discussed the *ex parte* letter dated April 30, 2019 which they filed together with Educational Media Foundation and their concerns regarding the FCC’s proposal to use a sliding scale based on the population of the service area of the complaining full power station to determine the minimum number of complaints that are needed for an FM translator interference complaint to be sustained. They recommended that the required number of complaints be tied to the population of the area of interference or the population of the translator service area not the population of a station’s entire service area. They also recommended that the maximum number of complaints included in any sliding scale be reduced.



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Respectfully submitted,

/s/ Sally A. Buckman  
Sally A. Buckman  
*Counsel to Beasley Media Group, LLC*

cc: Nathan Leamer  
Albert Shuldiner